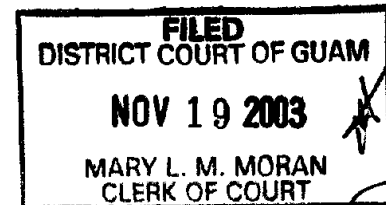


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Attorneys for Defendant The Hongkong and Shanghai Banking Corporation Ltd.

IN THE DISTRICT COURT OF GUAM

ALAN SADHWANI, LAJU)
SADHWANI, and K. SADHWANI'S)
INC., a Guam corporation,)
)
Plaintiffs,)
)
v.)
)
HONGKONG AND SHANGHAI)
BANKING CORPORATION, LTD.,)
et al.,)
Defendants.)
_____)

CIVIL CASE NO. 03-00036

**DECLARATION OF JACQUES
A. BRONZE IN SUPPORT OF
EX PARTE APPLICATION
AND MOTION FOR ORDER
GRANTING LEAVE TO HSBC
TO EXCEED PAGE LIMITS
IN MEMORANDA
[L. R. 7.1(j)(1)]**

I, JACQUES A. BRONZE, do hereby declare as follows:

1. I am over the age of eighteen (18) years and competent to make this Declaration. I have personal knowledge of the matters stated herein and would be competent to testify thereto at any proceedings.

2. I am admitted to practice before this Court and am counsel responsible for the representation of Defendant The Hongkong and Shanghai Banking Corporation

ORIGINAL

Limited ("HSBC"). A good faith effort has been made by counsel to advise counsel for Plaintiffs of the substance of HSBC's Ex Parte Application and Motion for Order Granting Leave to HSBC to Exceed Page Limits in Memoranda ("Ex Parte Application"). Copies of all pleadings relating to the Ex parte Application and Motion will be served upon Plaintiffs' counsel upon filing with this Court. The date and time the Court will consider the Ex parte Application is not yet known. However, as soon as such information is made available to my office we will advise Plaintiffs' attorneys.

3. It is expected that counsel for Plaintiffs will oppose the Ex Parte Application and will desire to be present if and when the Ex parte Application is either presented to or entertained by the Court.

4. It is important and urgent that the Ex Parte Application be heard as soon as possible because HSBC is preparing a motion to dismiss most, if not all, of the causes of action contained in the Complaint for Damages ("Complaint") herein. As more fully described in the Motion contemporaneously filed herein, the length of the Complaint and the breadth and complexity of the issues raised therein constitute extraordinary and compelling reasons supporting HSBC's request for leave to exceed the page limitations imposed by Local Rule 7.1(g) for its memoranda supporting the motion to dismiss.

5. HSBC has requested that counsel for Plaintiffs stipulate to the request for leave to exceed the page limits, but the request was refused without explanation.

Sadhwani, et al. v. Hongkong and Shanghai Banking Corporation Ltd., et al.

Civil Case No. 03-00036

Declaration of Jacques A. Bronze in Support of Ex Parte Application and Motion for Order Granting Leave to HSBC to Exceed Page Limits in Memoranda

Page 3 of 3 pages

Accordingly, HSBC has no other alternative than to apply to this Court for relief.

6. This Declaration is made in compliance with Local Rule 7.1(j)(1).

I declare under penalty of perjury under the laws of the United States and Guam that the foregoing is true and correct.

Dated this 19th day of November, 2003.



JACQUES A. BRONZE